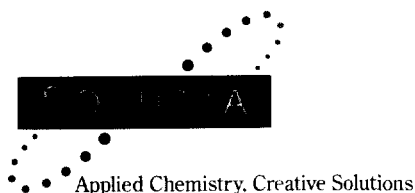


167483



Solutia Inc.
10300 Olive Boulevard
P.O. Box 66760
St. Louis, Missouri 63166-6760
Tel 314-674-1000

April 12, 1999

**To: Mr. Michael McAteer
U. S. EPA - Region 5
77 West Jackson Boulevard (SR-6J)
Chicago, Illinois 60604-3590**

**Mr. Thomas Martin
Associate Regional Counsel
U. S. EPA - Region 5
77 West Jackson Boulevard (C-14J)
Chicago, Illinois 60604-3590**

**Mr. Paul Takacs
Illinois Environmental Protection Agency
Bureau of Land
1001 North Grand Ave. East
Springfield, IL 62702**

**Re: April 9, 1999 submittal of the Support Sampling Plan for Sauget Sites Area I
January 21, 1999 Administrative Order by Consent**

Mr. McAteer, Mr. Martin and Mr. Takacs,

As required by the January 21, 1999 Administrative Order on Consent, Solutia submitted the Sauget Area 1 EE/CA and RI/FS Support Sampling Plan, Field Sampling Plans, Quality Assurance Project Plans and Health and Safety Plans on April 9, 1999. Because of the tight 21 day time frame for submittal of these documents, Solutia wishes to submit new editions of two sections of this submittal. Specifically, Volume 1 C, "Ecological Risk Assessment" and Volume 3, "Ecological Sampling QAPP, FSP and HASP" should be replaced with the attached improved versions of these documents.

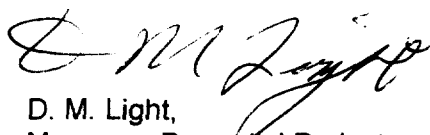
A minor correction has been made in the Support Sampling Plan Section 15.0, "Project Team Organization", and should to be replaced with the attached amended document. ENSR and Menzie•Cura, the human health and ecological risk assessment contractors respectively, were not mentioned in the discussion of data transfer. The attached amended Section 15.0 includes these two contractors in this discussion.

An unresolved issue in Solutia's April 9th SSP submittal that arises on any project dealing with constituents that can cause effects at concentrations lower than normal analytical procedures can practically quantitate, is the disparity between the Data Quality Limits (DQLs) and the Practical Quantitation Limits (PQLs). To reach closure on this issue, Solutia suggests that the Agency's analytical specialists meet with Solutia's analytical specialists to identify improvements in SW-846 methods that will lower method PQLs so that they approach DQLs to the degree practicable with current analytical equipment and methodologies. Solutia is prepared to meet upon request.

Contrary to Solutia's original plans as discussed in the March 25 & March 26 conference calls - to make the 103c and 104e documents review and selection of analytical parameters a separate work activity of the SSP - results of this review were actually included in the April 9th SSP submittal. This earlier than expected submittal and the resultant positive effect on the overall schedule, was made possible because Solutia's attorneys had already been researching the U. S. EPA and IEPA files, including 103c and 104e submittals, as part of their ongoing cost recovery efforts on behalf of Solutia. Thompson Coburn's results were therefore incorporated as Section 5.1.1, "Overview of Disposal Information Available", Section 5.1.2, "Disposals into the Village Sewer and Dead Creek" and Section 5.1.3, "Disposals at Sauget Area 1 Source Areas".

Solutia respectfully requests that the Agency consider these suggestions, additions and corrections in its review of the April 9th SSP submittal.

Sincerely,



D. M. Light,
Manager, Remedial Projects

cc: T. Gouger, USACE
F. Sevold, Weston
K. De La Bruere, USFW
B. Yare - Solutia

J. Nassif, Esq., Thompson Coburn
L. Tape, Esq., Thompson Coburn
B. Gilhousen, Esq., Solutia